

**UNITED STATES DISTRICT COURT**

## **NORTHERN DISTRICT OF CALIFORNIA**

YINTAO YU, an individual,

Plaintiff,

VS.

BYTEDANCE INC., a Delaware corporation;  
SHUYI (SELENE) GAO, an individual.

## Defendants.

Case No. 3:23-cv-04910-SI

**[PROPOSED] ORDER GRANTING  
DEFENDANTS' MOTION FOR SANCTIONS  
AGAINST CHARLES JUNG AND JAIME  
DORENBAUM**

[Originally San Francisco Superior Court  
No. CGC-23-608845]

State Action Filed: September 5, 2023  
Removal Date: September 25, 2023  
Trial Date: November 18, 2024

BYTEDANCE INC., a Delaware  
Corporation,

## Counter-Claimant

VS.

YINTAO YU, an individual,

### Counter-Defendant.

1                   **TO ALL PARTIES AND THEIR COUNSEL OF RECORD:**

2                   **PLEASE TAKE NOTICE** that Defendants ByteDance Inc. and Shuyi (Selene) Gao (collectively,  
 3 “Defendants”) did move this Court for an Order granting sanctions against Charles Jung and Jaime  
 4 Dorenbaum under either 28 U.S.C. § 1927, this Court’s inherent authority, or both (the “Motion”).

5                   Having considered Defendants’ Motion, and for good cause shown, the Court GRANTS the  
 6 Motion and orders sanctions against Charles Jung and Jaime Dorenbaum.

7                   Based on the files and records before the Court and for good cause shown, IT IS HEREBY  
 8 ORDERED THAT

9                   Charles Jung and Jaime Dorenbaum (collectively, “Yu’s Counsel”) are hereby sanctioned  
 10 \$6,280,077.38 pursuant to 28 U.S.C. § 1927 and this Court’s inherent powers because they unreasonably  
 11 and vexatiously multiplied the proceedings in this case by, amongst other things: (1) failing to conduct  
 12 any investigation or perform any due diligence regarding the anonymous declarant; (2) making false  
 13 representations and/or reckless misrepresentations—some under penalty of perjury—to this Court  
 14 including but not limited to those regarding the anonymous declarant; (3) engaging in tactical maneuvers  
 15 designed to avoid the arbitration process to which their client Yintao (Roger) Yu expressly consented  
 16 during his employment with BDI and ultimately voluntarily submitted his claims; and (4) attempting to  
 17 excuse their misconduct with more misrepresentations rather than correct their meritless positions.

18                   IT IS SO ORDERED.

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 20 Dated: \_\_\_\_\_, 2025

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21                   HON. SUSAN ILLSTON  
 22                   DISTRICT COURT JUDGE